



**Chairperson: Bob Wyatt, NW Natural**  
**Treasurer: Fred Wolf, Legacy Site Services for Arkema**

November 19, 2008

Chip Humphrey  
Eric Blischke  
U.S. Environmental Protection Agency, Region 10  
805 SW Broadway, Suite 500  
Portland, OR 97205

**Re: EPA comments on Portland Harbor RI/FS Stormwater Loading Calculation Methods (Anchor Environmental, L.L.C.), May 16, 2008, and Proposed Method for Calculating Basin-weighted Statistics for Stormwater Data Technical Memorandum, September 2, 2008. (Lower Willamette River, Portland Harbor Superfund Site, USEPA Docket No: CERCLA-10-2001-0240)**

Chip and Eric:

The Lower Willamette Group (LWG) has reviewed comments on the above referenced documents provided by EPA on November 3, 2008 and is providing the following response. LWG generally accepts the comments and is providing the following clarifications of our understanding regarding three items in the letter and attachments.

- 1. EPA Comment: Cover Letter Language** - The cover letter states that "EPA is hereby approving the Stormwater Loading Calculation Methods contingent upon Lower Willamette Group (LWG) acceptance of the comments and check-in points included as Enclosures A and B".

**LWG Response:** It is LWG's understanding that when EPA uses terms like "may", "primarily", "recommend", or "should" in the detailed comments, the LWG has some flexibility in executing these steps, even in light of the wording in the cover letter.

- 2. EPA Comment: New Loading Statistical Model Parameter Selection Methods** – Attachment 1, 2 and 3 of Enclosure A contain new information not previously seen by or discussed with LWG. Comment 5.3.1, p. 21, Method 2, indicates that this new information is "recommended" for use.

**LWG Response:** LWG understands that these comments are recommendations, not requirements, and the LWG will fully evaluate them. LWG may choose to not conduct some of these methods, for reasons that will be stated in RI Report.

- 3. EPA Comment: LWG/EPA Check-in Process** – Enclosure B of the EPA comments lists four check-in points and states that, "These check-in points should be part of a

broader check-in point(s) on the contaminant fate and transport model ("Hybrid Model") for the Portland Harbor site."

**LWG Response** - LWG understands this statement to mean that there will be one check-in point where the 4 issues mentioned in Enclosure B will be discussed.

LWG is proceeding with the calculation of stormwater loading in accordance with the November 3, 2008 comments with the assumption that the above clarifications are acceptable. If you have any questions regarding this letter, please contact me.

Sincerely,



Bob Wyatt

cc:     Confederated Tribes and Bands of the Yakama Nation  
          Confederated Tribes of the Grand Ronde Community of Oregon  
          Confederated Tribes of Siletz Indians of Oregon  
          Confederated Tribes of the Umatilla Indian Reservation  
          Confederated Tribes of the Warm Springs Reservation of Oregon  
          Nez Perce Tribe  
          Oregon Department of Fish & Wildlife  
          United States Fish & Wildlife  
          Oregon Department of Environmental Quality  
          LWG Legal  
          LWG Repository